

1 **IN THE UNITED STATES DISTRICT COURT**
2 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
3 **SAN FRANCISCO DIVISION**
4

Cedar Lane Technologies Inc.,

Plaintiff,

v.

Vivotek USA Inc.,

Defendant.

Case No.

Patent Case

Jury Trial Demanded

5
6 **COMPLAINT FOR PATENT INFRINGEMENT**

7 Plaintiff Cedar Lane Technologies Inc. (“Plaintiff”), through its attorneys, complains of
8 Vivotek USA Inc. (“Defendant”), and alleges the following:

9 **PARTIES**

10 1. Plaintiff Cedar Lane Technologies Inc. is a corporation organized and existing
11 under the laws of Canada that maintains its principal place of business at 560 Baker Street, Suite
12 1, Nelson, BC V1L 4H9.

13 2. Defendant Vivotek USA Inc. is a corporation organized and existing under the
14 laws of California that maintains an established place of business at 2050 Ringwood Avenue,
15 San Jose, CA 95131.

16 **JURISDICTION**

17 3. This is an action for patent infringement arising under the patent laws of the
18 United States, Title 35 of the United States Code.

19 4. This Court has exclusive subject matter jurisdiction under 28 U.S.C. §§ 1331 and
20 1338(a).

The '527 Patent

10. The '527 Patent is entitled "Module and method for interfacing analog/digital converting means and JPEG compression means," and issued 10/29/2002. The application leading to the '527 Patent was filed on 6/1/1999. A true and correct copy of the '527 Patent is attached hereto as Exhibit 2 and incorporated herein by reference.

11. The '527 Patent is valid and enforceable.

The '832 Patent

12. The '832 Patent is entitled "Method, apparatus computer program produce for tacking objects in a warped video image," and issued 8/2/2005. The application leading to the '832 Patent was filed on 9/11/2000. A true and correct copy of the '832 Patent is attached hereto as Exhibit 3 and incorporated herein by reference.

13. The '832 Patent is valid and enforceable.

The '790 Patent

14. The '790 Patent is entitled "Host interface for imaging arrays," and issued 12/6/2005. The application leading to the '790 Patent was filed on 12/21/2000. A true and correct copy of the '790 Patent is attached hereto as Exhibit 4 and incorporated herein by reference.

15. The '790 Patent is valid and enforceable.

The '261 Patent

16. The '261 Patent is entitled "Virtual reality camera," and issued 11/6/2007. The application leading to the '261 Patent was filed on 8/20/1999. A true and correct copy of the '261 Patent is attached hereto as Exhibit 5 and incorporated herein by reference.

17. The '261 Patent is valid and enforceable.

The '242 Patent

18. The '242 Patent is entitled "Host interface for imaging arrays," and issued 9/17/2013. The application leading to the '242 Patent was filed on 10/27/2005. A true and correct copy of the '242 Patent is attached hereto as Exhibit 6 and incorporated herein by reference.

19. The '242 Patent is valid and enforceable.

The '087 Patent

20. The '087 Patent is entitled "Presenting panoramic images with geometric transformation," and issued 3/19/2013. The application leading to the '087 Patent was filed on 1/27/2011. A true and correct copy of the '087 Patent is attached hereto as Exhibit 7 and incorporated herein by reference.

21. The '087 Patent is valid and enforceable.

COUNT 1: INFRINGEMENT OF THE '089 PATENT

22. Plaintiff incorporates the above paragraphs herein by reference.

23. **Direct Infringement.** Defendant has been and continues to directly infringe one or more claims of the '089 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringe at least the exemplary claims of the '089 Patent also identified in the charts incorporated into this Count below (the "Exemplary '089 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the '089 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

1 24. Defendant also has and continues to directly infringe, literally or under the
2 doctrine of equivalents, the Exemplary '089 Patent Claims, by having its employees internally
3 test and use these Exemplary Products.

4 25. The service of this Complaint upon Defendant constitutes actual knowledge of
5 infringement as alleged here.

6 26. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer
7 for sale, market, and/or import into the United States, products that infringe the '089 Patent. On
8 information and belief, Defendant has also continued to sell the Exemplary Defendant Products
9 and distribute product literature and website materials inducing end users and others to use its
10 products in the customary and intended manner that infringes the '089 Patent. Thus, on
11 information and belief, Defendant is contributing to and/or inducing the infringement of the '089
12 Patent.

13 27. **Induced Infringement.** Defendant actively, knowingly, and intentionally has
14 been and continues to induce infringement of the '089 Patent, literally or by the doctrine of
15 equivalents, by selling Exemplary Defendant Products to their customers for use in end-user
16 products in a manner that infringes one or more claims of the '089 Patent.

17 28. **Contributory Infringement.** Defendant actively, knowingly, and intentionally
18 has been and continues materially contribute to their own customers' infringement of the '089
19 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to
20 their customers for use in end-user products in a manner that infringes one or more claims of the
21 '089 Patent. Moreover, the Exemplary Defendant Products are not a staple article of commerce
22 suitable for substantial noninfringing use.

29. Exhibit 8 includes charts comparing the Exemplary '089 Patent Claims to the Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products practice the technology claimed by the '089 Patent. Accordingly, the Exemplary Defendant Products incorporated in these charts satisfy all elements of the Exemplary '089 Patent Claims.

30. Plaintiff therefore incorporates by reference in its allegations herein the claim charts of Exhibit 8.

31. Plaintiff is entitled to recover damages adequate to compensate for Defendant's infringement.

COUNT 2: INFRINGEMENT OF THE '527 PATENT

32. Plaintiff incorporates the above paragraphs herein by reference.

33. **Direct Infringement.** Defendant has been and continues to directly infringe one or more claims of the '527 Patent in at least this District by making, using, offering to sell, selling and/or importing, without limitation, at least the Defendant products identified in the charts incorporated into this Count below (among the "Exemplary Defendant Products") that infringe at least the exemplary claims of the '527 Patent also identified in the charts incorporated into this Count below (the "Exemplary '527 Patent Claims") literally or by the doctrine of equivalents. On information and belief, numerous other devices that infringe the claims of the '527 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its customers.

34. Defendant also has and continues to directly infringe, literally or under the doctrine of equivalents, the Exemplary '527 Patent Claims, by having its employees internally test and use these Exemplary Products.

35. The service of this Complaint upon Defendant constitutes actual knowledge of infringement as alleged here.

1 36. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer
2 for sale, market, and/or import into the United States, products that infringe the '527 Patent. On
3 information and belief, Defendant has also continued to sell the Exemplary Defendant Products
4 and distribute product literature and website materials inducing end users and others to use its
5 products in the customary and intended manner that infringes the '527 Patent. Thus, on
6 information and belief, Defendant is contributing to and/or inducing the infringement of the '527
7 Patent.

8 37. **Induced Infringement.** Defendant actively, knowingly, and intentionally has
9 been and continues to induce infringement of the '527 Patent, literally or by the doctrine of
10 equivalents, by selling Exemplary Defendant Products to their customers for use in end-user
11 products in a manner that infringes one or more claims of the '527 Patent.

12 38. **Contributory Infringement.** Defendant actively, knowingly, and intentionally
13 has been and continues materially contribute to their own customers' infringement of the '527
14 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to
15 their customers for use in end-user products in a manner that infringes one or more claims of the
16 '527 Patent. Moreover, the Exemplary Defendant Products are not a staple article of commerce
17 suitable for substantial noninfringing use.

18 39. Exhibit 9 includes charts comparing the Exemplary '527 Patent Claims to the
19 Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products
20 practice the technology claimed by the '527 Patent. Accordingly, the Exemplary Defendant
21 Products incorporated in these charts satisfy all elements of the Exemplary '527 Patent Claims.

22 40. Plaintiff therefore incorporates by reference in its allegations herein the claim
23 charts of Exhibit 9.

1 41. Plaintiff is entitled to recover damages adequate to compensate for Defendant's
2 infringement.

3 **COUNT 3: INFRINGEMENT OF THE '832 PATENT**

4 42. Plaintiff incorporates the above paragraphs herein by reference.

5 43. **Direct Infringement.** Defendant has been and continues to directly infringe one
6 or more claims of the '832 Patent in at least this District by making, using, offering to sell,
7 selling and/or importing, without limitation, at least the Defendant products identified in the
8 charts incorporated into this Count below (among the "Exemplary Defendant Products") that
9 infringe at least the exemplary claims of the '832 Patent also identified in the charts incorporated
10 into this Count below (the "Exemplary '832 Patent Claims") literally or by the doctrine of
11 equivalents. On information and belief, numerous other devices that infringe the claims of the
12 '832 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its
13 customers.

14 44. Defendant also has and continues to directly infringe, literally or under the
15 doctrine of equivalents, the Exemplary '832 Patent Claims, by having its employees internally
16 test and use these Exemplary Products.

17 45. The service of this Complaint upon Defendant constitutes actual knowledge of
18 infringement as alleged here.

19 46. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer
20 for sale, market, and/or import into the United States, products that infringe the '832 Patent. On
21 information and belief, Defendant has also continued to sell the Exemplary Defendant Products
22 and distribute product literature and website materials inducing end users and others to use its
23 products in the customary and intended manner that infringes the '832 Patent. Thus, on

1 information and belief, Defendant is contributing to and/or inducing the infringement of the '832
2 Patent.

3 47. **Induced Infringement.** Defendant actively, knowingly, and intentionally has
4 been and continues to induce infringement of the '832 Patent, literally or by the doctrine of
5 equivalents, by selling Exemplary Defendant Products to their customers for use in end-user
6 products in a manner that infringes one or more claims of the '832 Patent.

7 48. **Contributory Infringement.** Defendant actively, knowingly, and intentionally
8 has been and continues materially contribute to their own customers' infringement of the '832
9 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to
10 their customers for use in end-user products in a manner that infringes one or more claims of the
11 '832 Patent. Moreover, the Exemplary Defendant Products are not a staple article of commerce
12 suitable for substantial noninfringing use.

13 49. Exhibit 10 includes charts comparing the Exemplary '832 Patent Claims to the
14 Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products
15 practice the technology claimed by the '832 Patent. Accordingly, the Exemplary Defendant
16 Products incorporated in these charts satisfy all elements of the Exemplary '832 Patent Claims.

17 50. Plaintiff therefore incorporates by reference in its allegations herein the claim
18 charts of Exhibit 10.

19 51. Plaintiff is entitled to recover damages adequate to compensate for Defendant's
20 infringement.

21 **COUNT 4: INFRINGEMENT OF THE '790 PATENT**

22 52. Plaintiff incorporates the above paragraphs herein by reference.

23 53. **Direct Infringement.** Defendant has been and continues to directly infringe one
24 or more claims of the '790 Patent in at least this District by making, using, offering to sell,

1 selling and/or importing, without limitation, at least the Defendant products identified in the
2 charts incorporated into this Count below (among the “Exemplary Defendant Products”) that
3 infringe at least the exemplary claims of the ’790 Patent also identified in the charts incorporated
4 into this Count below (the “Exemplary ’790 Patent Claims”) literally or by the doctrine of
5 equivalents. On information and belief, numerous other devices that infringe the claims of the
6 ’790 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its
7 customers.

8 54. Defendant also has and continues to directly infringe, literally or under the
9 doctrine of equivalents, the Exemplary ’790 Patent Claims, by having its employees internally
10 test and use these Exemplary Products.

11 55. The service of this Complaint upon Defendant constitutes actual knowledge of
12 infringement as alleged here.

13 56. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer
14 for sale, market, and/or import into the United States, products that infringe the ’790 Patent. On
15 information and belief, Defendant has also continued to sell the Exemplary Defendant Products
16 and distribute product literature and website materials inducing end users and others to use its
17 products in the customary and intended manner that infringes the ’790 Patent. Thus, on
18 information and belief, Defendant is contributing to and/or inducing the infringement of the ’790
19 Patent.

20 57. **Induced Infringement.** Defendant actively, knowingly, and intentionally has
21 been and continues to induce infringement of the ’790 Patent, literally or by the doctrine of
22 equivalents, by selling Exemplary Defendant Products to their customers for use in end-user
23 products in a manner that infringes one or more claims of the ’790 Patent.

1 58. **Contributory Infringement.** Defendant actively, knowingly, and intentionally
2 has been and continues materially contribute to their own customers' infringement of the '790
3 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to
4 their customers for use in end-user products in a manner that infringes one or more claims of the
5 '790 Patent. Moreover, the Exemplary Defendant Products are not a staple article of commerce
6 suitable for substantial noninfringing use.

7 59. Exhibit 11 includes charts comparing the Exemplary '790 Patent Claims to the
8 Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products
9 practice the technology claimed by the '790 Patent. Accordingly, the Exemplary Defendant
10 Products incorporated in these charts satisfy all elements of the Exemplary '790 Patent Claims.

11 60. Plaintiff therefore incorporates by reference in its allegations herein the claim
12 charts of Exhibit 11.

13 61. Plaintiff is entitled to recover damages adequate to compensate for Defendant's
14 infringement.

15 **COUNT 5: INFRINGEMENT OF THE '261 PATENT**

16 62. Plaintiff incorporates the above paragraphs herein by reference.

17 63. **Direct Infringement.** Defendant has been and continues to directly infringe one
18 or more claims of the '261 Patent in at least this District by making, using, offering to sell,
19 selling and/or importing, without limitation, at least the Defendant products identified in the
20 charts incorporated into this Count below (among the "Exemplary Defendant Products") that
21 infringe at least the exemplary claims of the '261 Patent also identified in the charts incorporated
22 into this Count below (the "Exemplary '261 Patent Claims") literally or by the doctrine of
23 equivalents. On information and belief, numerous other devices that infringe the claims of the

1 '261 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its
2 customers.

3 64. Defendant also has and continues to directly infringe, literally or under the
4 doctrine of equivalents, the Exemplary '261 Patent Claims, by having its employees internally
5 test and use these Exemplary Products.

6 65. The service of this Complaint upon Defendant constitutes actual knowledge of
7 infringement as alleged here.

8 66. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer
9 for sale, market, and/or import into the United States, products that infringe the '261 Patent. On
10 information and belief, Defendant has also continued to sell the Exemplary Defendant Products
11 and distribute product literature and website materials inducing end users and others to use its
12 products in the customary and intended manner that infringes the '261 Patent. Thus, on
13 information and belief, Defendant is contributing to and/or inducing the infringement of the '261
14 Patent.

15 67. **Induced Infringement.** Defendant actively, knowingly, and intentionally has
16 been and continues to induce infringement of the '261 Patent, literally or by the doctrine of
17 equivalents, by selling Exemplary Defendant Products to their customers for use in end-user
18 products in a manner that infringes one or more claims of the '261 Patent.

19 68. **Contributory Infringement.** Defendant actively, knowingly, and intentionally
20 has been and continues materially contribute to their own customers' infringement of the '261
21 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to
22 their customers for use in end-user products in a manner that infringes one or more claims of the

1 '261 Patent. Moreover, the Exemplary Defendant Products are not a staple article of commerce
2 suitable for substantial noninfringing use.

3 69. Exhibit 12 includes charts comparing the Exemplary '261 Patent Claims to the
4 Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products
5 practice the technology claimed by the '261 Patent. Accordingly, the Exemplary Defendant
6 Products incorporated in these charts satisfy all elements of the Exemplary '261 Patent Claims.

7 70. Plaintiff therefore incorporates by reference in its allegations herein the claim
8 charts of Exhibit 12.

9 71. Plaintiff is entitled to recover damages adequate to compensate for Defendant's
10 infringement.

11 **COUNT 6: INFRINGEMENT OF THE '242 PATENT**

12 72. Plaintiff incorporates the above paragraphs herein by reference.

13 73. **Direct Infringement.** Defendant has been and continues to directly infringe one
14 or more claims of the '242 Patent in at least this District by making, using, offering to sell,
15 selling and/or importing, without limitation, at least the Defendant products identified in the
16 charts incorporated into this Count below (among the "Exemplary Defendant Products") that
17 infringe at least the exemplary claims of the '242 Patent also identified in the charts incorporated
18 into this Count below (the "Exemplary '242 Patent Claims") literally or by the doctrine of
19 equivalents. On information and belief, numerous other devices that infringe the claims of the
20 '242 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its
21 customers.

22 74. Defendant also has and continues to directly infringe, literally or under the
23 doctrine of equivalents, the Exemplary '242 Patent Claims, by having its employees internally
24 test and use these Exemplary Products.

1 75. The service of this Complaint upon Defendant constitutes actual knowledge of
2 infringement as alleged here.

3 76. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer
4 for sale, market, and/or import into the United States, products that infringe the '242 Patent. On
5 information and belief, Defendant has also continued to sell the Exemplary Defendant Products
6 and distribute product literature and website materials inducing end users and others to use its
7 products in the customary and intended manner that infringes the '242 Patent. Thus, on
8 information and belief, Defendant is contributing to and/or inducing the infringement of the '242
9 Patent.

10 77. **Induced Infringement.** Defendant actively, knowingly, and intentionally has
11 been and continues to induce infringement of the '242 Patent, literally or by the doctrine of
12 equivalents, by selling Exemplary Defendant Products to their customers for use in end-user
13 products in a manner that infringes one or more claims of the '242 Patent.

14 78. **Contributory Infringement.** Defendant actively, knowingly, and intentionally
15 has been and continues materially contribute to their own customers' infringement of the '242
16 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to
17 their customers for use in end-user products in a manner that infringes one or more claims of the
18 '242 Patent. Moreover, the Exemplary Defendant Products are not a staple article of commerce
19 suitable for substantial noninfringing use.

20 79. Exhibit 13 includes charts comparing the Exemplary '242 Patent Claims to the
21 Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products
22 practice the technology claimed by the '242 Patent. Accordingly, the Exemplary Defendant
23 Products incorporated in these charts satisfy all elements of the Exemplary '242 Patent Claims.

1 80. Plaintiff therefore incorporates by reference in its allegations herein the claim
2 charts of Exhibit 13.

3 81. Plaintiff is entitled to recover damages adequate to compensate for Defendant's
4 infringement.

5 **COUNT 7: INFRINGEMENT OF THE '087 PATENT**

6 82. Plaintiff incorporates the above paragraphs herein by reference.

7 83. **Direct Infringement.** Defendant has been and continues to directly infringe one
8 or more claims of the '087 Patent in at least this District by making, using, offering to sell,
9 selling and/or importing, without limitation, at least the Defendant products identified in the
10 charts incorporated into this Count below (among the "Exemplary Defendant Products") that
11 infringe at least the exemplary claims of the '087 Patent also identified in the charts incorporated
12 into this Count below (the "Exemplary '087 Patent Claims") literally or by the doctrine of
13 equivalents. On information and belief, numerous other devices that infringe the claims of the
14 '087 Patent have been made, used, sold, imported, and offered for sale by Defendant and/or its
15 customers.

16 84. Defendant also has and continues to directly infringe, literally or under the
17 doctrine of equivalents, the Exemplary '087 Patent Claims, by having its employees internally
18 test and use these Exemplary Products.

19 85. The service of this Complaint upon Defendant constitutes actual knowledge of
20 infringement as alleged here.

21 86. Despite such actual knowledge, Defendant continues to make, use, test, sell, offer
22 for sale, market, and/or import into the United States, products that infringe the '087 Patent. On
23 information and belief, Defendant has also continued to sell the Exemplary Defendant Products
24 and distribute product literature and website materials inducing end users and others to use its

1 products in the customary and intended manner that infringes the '087 Patent. Thus, on
2 information and belief, Defendant is contributing to and/or inducing the infringement of the '087
3 Patent.

4 87. **Induced Infringement.** Defendant actively, knowingly, and intentionally has
5 been and continues to induce infringement of the '087 Patent, literally or by the doctrine of
6 equivalents, by selling Exemplary Defendant Products to their customers for use in end-user
7 products in a manner that infringes one or more claims of the '087 Patent.

8 88. **Contributory Infringement.** Defendant actively, knowingly, and intentionally
9 has been and continues materially contribute to their own customers' infringement of the '087
10 Patent, literally or by the doctrine of equivalents, by selling Exemplary Defendant Products to
11 their customers for use in end-user products in a manner that infringes one or more claims of the
12 '087 Patent. Moreover, the Exemplary Defendant Products are not a staple article of commerce
13 suitable for substantial noninfringing use.

14 89. Exhibit 14 includes charts comparing the Exemplary '087 Patent Claims to the
15 Exemplary Defendant Products. As set forth in these charts, the Exemplary Defendant Products
16 practice the technology claimed by the '087 Patent. Accordingly, the Exemplary Defendant
17 Products incorporated in these charts satisfy all elements of the Exemplary '087 Patent Claims.

18 90. Plaintiff therefore incorporates by reference in its allegations herein the claim
19 charts of Exhibit 14.

20 91. Plaintiff is entitled to recover damages adequate to compensate for Defendant's
21 infringement.

22 **JURY DEMAND**

PRAYER FOR RELIEF

- A. A judgment that the '089 Patent is valid and enforceable;
- B. A judgment that Defendant has infringed, contributorily infringed, and/or induced infringement of one or more claims of the '089 Patent;
- C. A judgment that the '527 Patent is valid and enforceable;
- D. A judgment that Defendant has infringed, contributorily infringed, and/or induced infringement of one or more claims of the '527 Patent;
- E. A judgment that the '832 Patent is valid and enforceable;
- F. A judgment that Defendant has infringed, contributorily infringed, and/or induced infringement of one or more claims of the '832 Patent;
- G. A judgment that the '790 Patent is valid and enforceable;
- H. A judgment that Defendant has infringed, contributorily infringed, and/or induced infringement of one or more claims of the '790 Patent;
- I. A judgment that the '261 Patent is valid and enforceable;
- J. A judgment that Defendant has infringed, contributorily infringed, and/or induced infringement of one or more claims of the '261 Patent;
- K. A judgment that the '242 Patent is valid and enforceable;
- L. A judgment that Defendant has infringed, contributorily infringed, and/or induced infringement of one or more claims of the '242 Patent;
- M. A judgment that the '087 Patent is valid and enforceable;

1 N. A judgment that Defendant has infringed, contributorily infringed, and/or induced
2 infringement of one or more claims of the '087 Patent;

3 O. An accounting of all damages not presented at trial;

4 P. A judgment that awards Plaintiff all appropriate damages under 35 U.S.C. § 284
5 for Defendant's past infringement, and any continuing or future infringement of
6 the Patents-in-Suit, up until the date such judgment is entered, including pre- or
7 post-judgment interest, costs, and disbursements as justified under 35 U.S.C. § 284
8 and, if necessary, to adequately compensate Plaintiff for Defendant's infringement,
9 an accounting:

10 i. that this case be declared exceptional within the meaning of 35 U.S.C. § 285
11 and that Plaintiff be awarded its reasonable attorneys' fees against Defendant
12 that it incurs in prosecuting this action;

13 ii. that Plaintiff be awarded costs, and expenses that it incurs in prosecuting this
14 action; and

15 iii. that Plaintiff be awarded such further relief at law or in equity as the Court
16 deems just and proper.
17

Dated: May 20, 2020

Respectfully submitted,

s/ Lindsey Wagner
Lindsey Wagner, Esq.
California Bar No. 309808
Lindsey Wagner, Esq.
lwagner@scottwagnerlaw.com
Scott Wagner and Associates, P.A.
Main Office:
Jupiter Gardens
250 South Central Boulevard, Suite 104
Jupiter, FL 33458

Telephone: (561) 653-0008

Facsimile: (561) 653-0020

California Office:

3500 W. Olive Ave, Suite 300

Burbank, CA 91505

Telephone: (213)377-5200

Facsimile: (561) 653-0020

s/ Isaac Rabicoff

Isaac Rabicoff

Rabicoff Law LLC

73 W Monroe St

Chicago, IL 60603

(773) 669-4590

isaac@rabilaw.com

Counsel for Plaintiff

Cedar Lane Technologies Inc.